

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
AMY TUTEUR, M.D.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 13-cv-10159-RGS
)	
GINA CROSLEY-CORCORAN,)	
)	
Defendant.)	
_____)	

**DEFENDANTS' UNOPPOSED MOTION TO EXTEND DISCOVERY
AND SUMMARY JUDGMENT DEADLINES**

Defendant Gina Crosley-Corcoran hereby moves that this Honorable Court enter an order extending the deadlines set for the conclusion of discovery and the filing of Summary Judgment motions for a period of three (3) months. In support of this motion, Ms. Crosley-Corcoran states as follows:

1. Counsel for Ms. Crosley-Corcoran have recently been retained as lead trial counsel for the defense in the matter of *Disney Enterprises, Inc. v. Hotfile, Inc.*, Civ. 11-20427, currently pending in the Southern District of Florida (the "Hotfile case").
2. The Hotfile case is scheduled for a two week jury trial starting on December 9, 2013. Although the case has been pending for approximately two years, Ms. Crosley-Corcoran's counsel were named as successor counsel less than two months before the start of trial. The Plaintiffs in the Hotfile case claim statutory damages in excess of \$500 million.

3. The transition to new counsel involves the review of dozens of deposition transcripts from witnesses, including the lengthy and complex depositions and reports of multiple expert witnesses, the review of tens of thousands (if not hundreds of thousands) of pages of documents, and two years of extensive motion practice. In addition, the Court in the Hotfile case has set out an extensive and aggressive pretrial schedule of motions, pretrial hearings, and briefing.

4. Ms. Crosley-Corcoran's counsel will be relocating to Florida starting this week and through the end of December to concentrate exclusively on the Hotfile case.

5. The Plaintiff has timely served paper discovery (interrogatories and document requests, responses to which were due on November 7) in this case and has recently noticed two depositions. Ms. Crosley-Corcoran intends to respond and object to certain of the discovery requests. Counsel are working cooperatively to set deadlines for such discovery practice.

6. Because the present request is made to accommodate Defendant counsels' trial schedule, the Defendants has agreed that, if Plaintiff's counsel determines at a later date that it needs additional time to complete discovery, the Defendant shall join in Plaintiff's request for one additional three (3) month extension of deadlines.

Accordingly, the Defendant respectfully requests that this Court extend the current discovery and summary judgment schedule by a period of three (3) months.

Respectfully submitted,

GINA CROSLEY-CORCORAN

By her attorney,

/s/ Evan Fray-Witzer

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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on November 11, 2013.

/s/ Evan Fray-Witzer